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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

TAYLOR THOMSON,
Plaintiff,

v.

PERSISTENCE TECHNOLOGIES BVI
PTE LTD., TUSHAR AGGARWAL, and
ASHLEY RICHARDSON,
Defendants.

Case No. 2:23-cv-04669-MEMF-MAR

**DECLARATION OF JULIAN L.
ANDRE IN SUPPORT OF
PLAINTIFF'S *EX PARTE*
APPLICATION TO CONTINUE
DISCOVERY AND RELATED
DEADLINES**

DECLARATION OF JULIAN L. ANDRÉ

I, Julian L. André, declare as follows:

1. I am an attorney admitted to practice before this Court in the above-captioned matter. I am a partner with the law firm of McDermott Will & Schulte LLP, attorneys of record for Plaintiff Taylor Thomson (“Plaintiff”) in the above-captioned matter. I make this declaration in support of Plaintiff’s *Ex Parte* Application to Continue Discovery and Related Deadlines.

2. Attached hereto as **Exhibit A**, are true and correct copies of an email thread between Plaintiff’s counsel and Defendant, dated from October 12, 2025 to October 14, 2025.

3. On October 14, 2025, Plaintiff’s counsel advised Defendant that, because she had declined to stipulate to an extension of the discovery cutoff and related deadlines, Plaintiff would proceed by *ex parte* application to continue the discovery dates previously proposed. Defendant stated that she would oppose the application.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 14th day of October, 2025, in Los Angeles, California.

/s/ Julian L. Andre
Julian L. André

McDERMOTT WILL & SCHULTE LLP
ATTORNEYS AT LAW
LOS ANGELES